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November 26, 2002

Mr. Kenneth Weinstein
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

BY FAX: (202) 366-8065

Re: Early Warning Reporting – NHTSA Docket No. 2001-8677

Dear Mr. Weinstein,

The tire manufacturer members of RMA¹ petitioned the agency on August 26, 2002 for reconsideration of certain issues raised in the final rule in the above referenced docket. RMA took great care and deliberation before filing the petition for reconsideration and urges NHTSA to consider and resolve all of the issues raised in the petition. However, RMA believes that certain issues must be resolved immediately so manufacturers can proceed with the development of compliant reporting systems.

This letter prioritizes the various issues RMA raised in that petition. Priority 1 represents issues RMA believes must be resolved prior to the initiation of a test of the ARTEMIS computer system. Priority 2 represents issues that must be resolved as soon as practicable. For clarity the issues are identified by the number and heading as they appeared in RMA's petition for reconsideration.

¹ **RMA's membership includes all of the country's major tire manufacturers: Bridgestone/Firestone Americas Holding, L.L.C., Continental Tire N.A., Inc., Cooper Tire & Rubber Company, The Goodyear Tire & Rubber Company, Michelin North America, Inc., Pirelli Tire North America, and Yokohama Tire Corporation.**

PRIORITY 1 – Needs to be resolved immediately

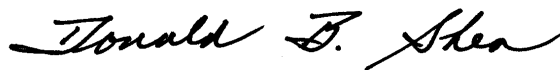
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|--|------------|
| “Minimal Specificity” for property damage claims. | II (A) |
| Property damage claims | II (B) |
| Warranty adjustments – “customer satisfaction condition” | II(C) |
| Reporting threshold | III. (A) 1 |
| Lists of “common green tires.” | III (A) 2 |
| Quarterly v. Cumulative Reporting | III (A) 6 |

PRIORITY 2 –Needs to be resolved as soon as practicable

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|---|-----------|
| Non-physical injuries | III (A) 3 |
| Imported tires on OE vehicles and imported replacement tires | III (A) 4 |
| Motorcycle tires | III (A) 5 |
| Definition of “affiliate” | III (B) 1 |
| Definition of “tire” | III (B) 2 |
| Definitions of reportable conditions associated with “crown”, “sidewall”, and “bead”. | III (B) 3 |
| One-time historical information | III (C) 1 |
| Scope of “Production Information” | III (C) 3 |

Thank you for your consideration of this information.

Sincerely,

A handwritten signature in black ink, reading "Donald B. Shea". The signature is written in a cursive style with a large, stylized "D" and "S".

Donald B. Shea
President & CEO